

ORIGINAL

Richard Kurnit (RK-2504)  
 Maura J. Wogan (MW-9589)  
 Nicole I. Hyland, Esq. (NH-7646)  
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[jlauderdale@calfee.com](mailto:jlauderdale@calfee.com)

*Attorneys for Defendant GCA Services Group, Inc.*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X  
 BUILDING SERVICE 32B-J BENEFIT :  
 FUNDS, :  
 :  
 Plaintiff, :  
 :  
 -against- :  
 :  
 GCA SERVICES GROUP, INC., :  
 :  
 Defendant. :  
 -----X

Case No. 07 Civ. 8381 (HB)

**MOTION FOR ADMISSION *PRO***  
***HAC VICE* OF JEFFREY J.**  
**LAUDERDALE**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard Kurnit, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Jeffrey J. Lauderdale (Ohio Bar No. 0074859)  
 Calfee, Halter & Griswold LLP  
 1400 KeyBank Center

800 Superior Avenue  
Cleveland, Ohio 44114-2688  
Tel.: (216) 622-8200  
Fax: (216) 241-0816  
[jlauderdale@calfee.com](mailto:jlauderdale@calfee.com).

Jeffrey J. Lauderdale is a member in good standing of the Supreme Court of Ohio, the U.S.D.C. Northern District of Ohio, the U.S.D.C. Southern District of Ohio, and the U.S.D.C. for the Western District of Michigan.

There are no pending disciplinary proceedings against Jeffrey J. Lauderdale in any State or Federal court.

Dated: New York, New York  
February 25, 2008

Respectfully submitted,

FRANKFURT KURNIT KLEIN & SELZ,  
P.C.

By: 

Richard Kurnit (RK-2504)  
Maura J. Wogan (MW-9589)  
Nicole I. Hyland (NH-7646)

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New York, New York 10022  
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*Attorneys for Defendant, GCA Services  
Group, Inc.*

TO: Michael Geffner (MG-6785)  
RAAB, STURM & GOLDMAN, LLP  
317 Madison Avenue  
New York, New York 10017

*Attorneys for Plaintiffs Building Service  
32B-J Benefit Funds*

Richard Kurnit (RK-2504)  
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Nicole I. Hyland, Esq. (NH-7646)  
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[rkurnit@fkks.com](mailto:rkurnit@fkks.com)

W. Eric Baisden (Ohio Bar No. 0055763)  
Jeffrey J. Lauderdale (Ohio Bar No. 0074859)  
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*Attorneys for Defendant GCA Services Group, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BUILDING SERVICE 32B-J BENEFIT	:
FUNDS,	:
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Plaintiff,	:
	:
-against-	:
	:
GCA SERVICES GROUP, INC.,	:
	:
Defendant.	:
-----X	

Case No. 07 Civ. 8381 (HB)

**AFFIDAVIT OF RICHARD  
KURNIT IN SUPPORT OF  
MOTION TO ADMIT JEFFREY  
J. LAUDERDALE *PRO HAC*  
*VICE***

STATE OF NEW YORK     )  
                                      ) SS.  
COUNTY OF NEW YORK    )

RICHARD KURNIT, being duly sworn, hereby deposes and says as follows:

1. I am a partner in the law firm of Frankfurt Kurnit Klein & Selz, P.C., counsel for defendant GCA Services Group, Inc. ("GCA"). I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of facts set forth herein and in support of GCA's motion to admit Jeffrey J. Lauderdale as counsel *pro hac vice* to represent GCA in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 26, 1976. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Jeffrey J. Lauderdale since 2007.

4. Mr. Lauderdale is an associate with the law firm of Calfee, Halter & Griswold LLP in Cleveland, Ohio.

5. I have found Mr. Lauderdale to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Jeffrey J. Lauderdale *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Jeffrey J. Lauderdale, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion made to admit Jeffrey J. Lauderdale, *pro hac vice*, to represent GCA in the above-captioned matter be granted.

Respectfully submitted,

  
Richard Kurnit (RK-2504)

SWORN TO before me this  
25th day of February 2008.

  
Notary Public

ROSEMARY SETTEDUCATO  
Notary Public, State of New York  
No. 24-4678133  
Qualified in New York County  
Commission Expires Dec 31, 2010

# The Supreme Court of Ohio

## C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Jeffrey Jason Lauderdale

was admitted to the practice of law in Ohio on August 30, 2002; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 8th day of February, 2008.

SUSAN B. CHRISTOFF

*Director, Attorney Services Division*

  
Sue Moore  
*Attorney Registration Specialist*

AO 136  
(Rev. 10/98)

# CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA :  
NORTHERN DISTRICT OF OHIO : ss.

I, GERI M. SMITH, Clerk of the United States Court for the Northern District of Ohio, Eastern Division,  
**DO HEREBY CERTIFY**, that **JEFFREY J. LAUDERDALE**, Bar #0074859, was duly admitted to practice  
in said Court on **November 5, 2003**, and is in good standing as a member of the bar of said Court.

Dated at Cleveland, OH

on February 8, 2008

GERI M. SMITH

Clerk of Court

By: *Gerri M. Smith*

Deputy Clerk

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO

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## CERTIFICATE OF GOOD STANDING

I, James Bonini, Clerk of this Court, certify that

**JEFFREY JASON LAUDERDALE #0074859**

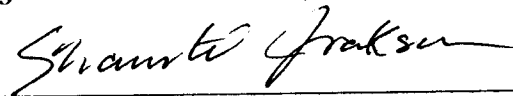
was duly admitted to practice in this Court on

June 5, 2007

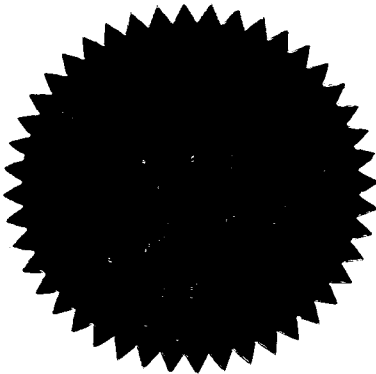
and is in good standing as a member of the Bar of this Court.

Dated at Columbus, Ohio on February 14, 2008.

JAMES BONINI, CLERK



By: Shawntel Jackson, Deputy Clerk





**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
OFFICE OF THE CLERK**  
[www.miwg.uscourts.gov](http://www.miwg.uscourts.gov)

399 Federal Bldg. 110 Michigan St., NW Grand Rapids, MI 49503 (616) 456-2381	B-35 Federal Bldg. 410 W. Michigan Ave. Kalamazoo, MI 49007 (269) 337-5706	113 Federal Bldg. 315 W. Allegan St. Lansing, MI 48933 (517) 377-1559	229 Federal Bldg. 202 W. Washington St. Marquette, MI 49855 (906) 226-2021
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## **CERTIFICATE OF GOOD STANDING**

I, Ronald C. Weston, Sr., Clerk of the United States District Court  
for the Western District of Michigan, do hereby certify that

**JEFFREY LAUDERDALE**

was duly admitted to practice in said Court on October 27, 2003  
and is in good standing as a member of the bar of said Court.

Ronald C. Weston, Sr., Clerk

Dated at Grand Rapids,  
Michigan, on February 11, 2008

By: Lauren Haroney  
Deputy Clerk

Richard Kurnit (RK-2504)  
 Maura J. Wogan (MW-9589)  
 Nicole I. Hyland, Esq. (NH-7646)  
 FRANKFURT KURNIT KLEIN & SELZ, P.C.  
 488 Madison Avenue, 10<sup>th</sup> Floor  
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[jlauderdale@calfee.com](mailto:jlauderdale@calfee.com)

*Attorneys for Defendant GCA Services Group, Inc.*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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BUILDING SERVICE 32B-J BENEFIT	:
FUNDS,	:
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Plaintiff,	:
	:
-against-	:
	:
GCA SERVICES GROUP, INC.,	:
	:
Defendant.	:
-----X	

Case No. 07 Civ. 8381 (HB)

**ORDER FOR ADMISSION OF  
 JEFFREY J. LAUDERDALE *PRO*  
 HAC VICE**

Upon the motion of Richard Kurnit, Frankfurt Kurnit Klein & Selz, P.C., attorney for  
 defendant GCA Services Group, Inc. and Richard Kurnit's affidavit in support:

IT IS HEREBY ORDERED that:

Jeffrey J. Lauderdale (Ohio Bar No. 0074859)  
 Calfee, Halter & Griswold LLP  
 1400 KeyBank Center

800 Superior Avenue  
Cleveland, Ohio 44114-2688  
Tel.: (216) 622-8200  
Fax: (216) 241-0816  
[jlauderdale@calfee.com](mailto:jlauderdale@calfee.com)

is admitted to practice *pro hac vice* as counsel for GCA Services Group, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:

SO ORDERED:

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U.S.D.J.


**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
  ) SS.  
COUNTY OF NEW YORK    )

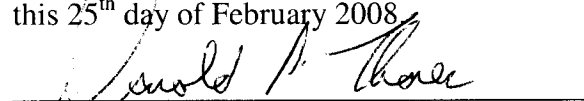
I, Mary C. Warden, state that I am over eighteen years of age and reside in Long Beach, New York.

On Monday, February 25, 2008, I served the attached MOTION FOR ADMISSION *PRO HAC VICE* OF JEFFREY J. LAUDERDALE, ESQ. and AFFIDAVIT OF RICHARD KURNIT IN SUPPORT OF MOTION TO ADMIT JEFFREY J. LAUDERDALE, ESQ. *PRO HAC VICE* by depositing a true copy thereof in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service, and via electronic mail, upon the following at their last known address:

Michael Geffner, Esq.  
RAAB, STURM & GOLDMAN, LLP  
317 Madison Avenue  
New York, New York 10017.

  
\_\_\_\_\_  
Mary C. Warden

SWORN TO before me  
this 25<sup>th</sup> day of February 2008

  
\_\_\_\_\_  
Notary Public

